



AirWaves, Inc  
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RE NPRM FCC 03-185 Digital Translator Service

Please Accept these comments on this matter.

1. Because of the long transmission distance on lower power levels with improved signal quality Digital appears to be the preferred method for rural America.
2. With several signals on one station, improved service will decrease the number of channels used. Many times in mountains, it takes several channels to bring one analog signal to one county. (See Summit County Utah). With Digital, use of boosters will allow for more service on fewer channels. Two mid definition channels on one translator using boosters can cut the number of channels needed by 75% in one area.
3. Promotes the local quality of Television. People do not always get local service on Satellite. For example, KEJT is Telemundo in Salt Lake City, but not on Satellite because we are Class A. We get out on Translators and Cable. It is essential Spanish speaking Utah residents understand our local news and state communications in Spanish.
4. Permission should also be granted to Low Power and Class A Stations in metro areas.
5. Digital Low Power and Translators should be authorized immediately because they:
  - a. Provide digital service to those who do not have it now.
  - b. Allow minority low power stations to move into the Digital mainstream.
  - c. Use the Spectrum better by allowing one translator to carry more than one station.
  - d. Provide competition for those stations who have a license and not built a Digital station.
6. In Metro Areas, Low Power and Class A stations are on a more even basis with full power stations, and can offer a good signal in the Metro area to those minorities and special interests served
7. To promote Digital and a change, the more digital signals with more diverse programming will encourage more homeowners to buy a set-top box
8. Existing applications should be permitted to change to digital, if they so choose, for better digital usage and to promote the Digital signal.
9. For better use of the spectrum, existing licensee must show how they can use their present analog channels for combined digital transmission.
10. No single licensee should control more than 3 digital channels in any county.

Submitted by

John C. Terrill  
President